



UNION CARBIDE CORPORATION 39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001  
CHEMICALS AND PLASTICS

H. W. Lichtenberger  
President

November 11, 1986

TO: J. H. Bees  
E. J. Boros  
W. H. Joyce  
A. W. Lutz  
J. C. Soviero  
P. T. Wright  
N. L. Zutty

CC: C&P Manufacturing Council  
C&P Plant Managers  
Engineering, Distribution &  
HS&EA Managers

Subject: Disposal of Electrical Equipment

As part of C&P's overall program to reduce long-term liability and decrease the use of landfills, it will be the policy within C&P to absolutely prohibit the landfill disposal of PCB transformers and other equipment without the specific approval of a Division President or higher authority. Approval is to be granted only if there is no practical alternative to land disposal.

This policy is not limited to electrical transformers, but applies to such things as electrical switches, fluorescent light ballasts and capacitors.

UCC's UNISON subsidiary is an excellent resource to provide advice and service relative to the retrofitting of existing PCB transformers. The C&P HS&EA Group can provide additional guidance, if needed, in implementing this policy.

Please communicate this policy to all responsible individuals in your respective organizations.

Very truly yours,

A handwritten signature in dark ink, appearing to be "B:Y" or a stylized version of the name.

H. W. Lichtenberger

HWL/mf

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EPA004851

UNION CARBIDE CORPORATION  
CHEMICALS & PLASTICS GROUP  
HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

P-2

39 OLD RIDGEBURY ROAD  
DANBURY, CT 06817-0001

TO: C/P HS&EA Managers  
C/P Division Environmental  
Coordinators  
C/P Component Coordinators

DATE: March 11, 1987

COPY: J. H. Bees  
C. L. Dudnick  
R. T. Jackson  
R. A. Matthews  
R. Van Mynen

SUBJECT: Disposal of Electrical  
Equipment

On November 11, Bill Lichtenberger issued the attached letter relative to disposal of electrical equipment containing PCB's. As a result of numerous inquiries regarding the scope of the policy prohibiting landfill disposal of such equipment, the attached guidance has been prepared to assist your locations in complying with this policy.

Please distribute this as needed within your Divisions. I'll be glad to answer any questions you have concerning the attached information.

Sincerely,

J. K. Petros

JKP/bd  
Attachment

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DRAFT

Guidance on PCB Equipment  
Disposal Within C/P

- Q. What equipment is covered by this policy?
- A. All electrical equipment with 50ppm or more of PCB's is included in this policy.
- Q. How do the TSCA PCB regulations apply to my efforts to comply with this policy?
- A. TSCA regulations do not apply to any piece of equipment, covered by this policy, which is not otherwise regulated under TSCA. For example, fluorescent light ballasts are not regulated under TSCA, and none of the TSCA labeling, recordkeeping, storage or disposal requirements would apply to those items.
- Q. How do I dispose of PCB equipment?
- A. Transformers and other electrical equipment with 50 ppm of PCB or greater which are regulated under TSCA, must still be disposed of in accordance with the requirements of 40 CFR 761.60. The only change is that the option to landfill liquid PCB's and equipment containing PCB liquids is prohibited unless approved by a Division President. Other electrical equipment, which is not regulated under TSCA but covered by this policy, should be collected in any convenient manner (for example, in 55 gallon drums in maintenance or electrical shops) and held until a sufficient amount is collected for disposal. Again, no TSCA regulatory constraints apply to this latter class of equipment. Incineration or other EPA approved treatment processes are recommended for these containers of otherwise non-regulated PCB electrical equipment. As above, if this is not practical, a Divisional President approval is required for landfill disposal. This policy also requires that any such<sup>PCB</sup> equipment to be landfilled should be sent to an approved PCB landfill, and not disposed of in a municipal landfill.
- Q. What procedure should I follow for obtaining approval from a Division President to landfill PCB's?
- A. The request to a Division President to approve landfill disposal of PCB's should be in writing. His response should clearly identify the equipment or circumstances for which the variance is being provided. For example, approval to landfill a transformer in order to comply with the TSCA storage limitations should be clearly outlined in the correspondence. Any approvals to landfill PCB's from an on-going activity should be reviewed annually. Any approval to landfill should require (1) the removal of PCB's to the greatest extent practicable, and (2) only use PCB approved landfills.

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- Q. May I dispose of properly drained and flushed electrical equipment in a landfill?
- A. Yes, electrical equipment (other than transformers) which has been properly drained and flushed to remove PCB's may be disposed of in an approved PCB landfill. Such equipment is not subject to the landfill prohibition since it is deemed to not contain PCB's. The flushing procedure outlined in 40 CRF 761.60 (b) (1) (i) (B) should be used to clean such equipment. *coord.*
- Q. How does the policy apply to electrical equipment whose PCB content is unknown?
- A. Under TSCA, oil-filled electrical equipment other than circuit breakers, reclosers and cable whose PCB concentration is unknown must be assumed to be PCB contaminated electrical equipment. The disposal of such equipment is already regulated. Any electrical equipment which is known, either by analysis or other information, to contain less than 50 ppm PCB's is not subject to this policy. According to EPA all oil-filled electrical equipment (including fluorescent light ballasts) manufactured after 7/1/78 will be labeled as "non PCB" equipment, and is not subject to this policy.
- Q. How does this policy apply to international locations and subsidiaries?
- A. This policy applies now at all domestic facilities. International facilities should comply with these provisions by November, 1988.

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EA POLICY/PROCEDURE MANUAL

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